

March 6, 2003

Mr. Les White  
Hebrew National Foods  
P.O. Box 2327  
Indianapolis, Indiana 46225

Re: Exempt Construction and Operation Status,  
097-15588-00431

Dear Mr. White:

The application from Hebrew National Foods, received on May 13, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following water heating system, to be located at 602 West Ray Street, Indianapolis, Indiana 46225, is classified as exempt from air pollution permit requirements:

One (1) Kemco natural gas fired water heating system, with a maximum capacity of 21 million Btu per hour (MMBtu/hr).

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the OES and IDEM, Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at 327-2846 or [aoliger@indygov.org](mailto:aoliger@indygov.org).

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez, Administrator

aco

cc: File  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oliger

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

**Source Name:** Hebrew National Foods  
**Source Location:** 602 West Ray Street, Indianapolis, Indiana 46225  
**County:** Marion  
**SIC Code:** 2013  
**Operation Permit No.:** 097-15588-00431  
**Permit Reviewer:** Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Hebrew National Foods relating to the construction and operation of the following emission unit:

One (1) Kemco natural gas fired water heating system, with a maximum heat input capacity of 21 million Btu per hour (MMBtu/hr).

**Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 1, 2002.

**Emission Calculations**

See Appendix A (one page) of this document for detailed emissions calculations.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.70
PM-10	0.70
SO <sub>2</sub>	0.06
VOC	0.51
CO	7.73
NO <sub>x</sub>	9.20
HAPs	0.16

HAP's	Potential To Emit (tons/year)
hexane	0.16

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.70
PM10	0.70
SO <sub>2</sub>	0.06
VOC	0.51
CO	7.73
NO <sub>x</sub>	9.20
Single HAP	0.16
Combination HAPs	0.16

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. This source is not subject to 40 CFR 60, Subpart Dc because it has no boilers.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 1-6 (Preventive Maintenance Plan)

This source is not subject to 326 IAC 1-6, because it is not required to obtain a permit under 326 IAC 2.

### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

### 326 IAC 2-6 (Emission Reporting)

This source is located in Marion County and its potential to emit any regulated pollutant is less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)**

The natural gas fired water heating system is not a source of indirect heating. Therefore, this source is not subject to the provisions of 326 IAC 6-2.

**326 IAC 7-1 (Sulfur Dioxide Emission Limitations)**

This rule does not apply to this source because the potential to emit is less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

**Conclusion**

The construction and operation of this natural gas fired water heating system shall be exempt from air pollution control permit requirements.

**Appendix A: Emissions Calculations**

Page 1 of 2 TSD App A

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: Hebrew National Foods**

**Address City IN Zip: 602 West Ray Street, Indianapolis, Indiana 46225**

**Exemption #: 097-15588-00431**

**Reviewer: Angelique Oliger**

**Date: 06-Mar-2003**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

21.0

184.0

**Pollutant**

Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.7	0.7	0.1	9.2	0.5	7.7

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

gasc99.wk4 9/95

updated 6/00

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**Gas Boiler**  
**HAPs Emissions**

**Company Name:** Hebrew National Foods  
**Address, City IN Zip:** 602 West Ray Street, Indianapolis, Indiana 46225  
**Exemption #** 097-15588-00431  
**Reviewer:** Angelique Olliger  
**Date:** 06-Mar-2003

AP-43 data given in lb/mmcf: To convert lb/mmcf-lb/mmbtu, divide by 1,020

**HAPs - Metals**

Emission Factor in lb/mmcf	Arsenic 2.0E-04	Beryllium 1.2E-05	Cadmium 1.1E-03	Chromium 1.4E-03	Lead 0.0E+00
Emission Factor in lb/mmBtu	2.0E-07	1.2E-08	1.1E-06	1.4E-06	0.0E+00
Potential Emission in tons/yr	1.80E-05	1.08E-06	9.92E-05	1.26E-04	0.00E+00

**HAPs - Metals (continued)**

Emission Factor in lb/mmcf	Mercury 2.6E-04	Manganese 3.8E-04	Nickel 2.1E-03	Selenium 2.4E-05	<b>Total Haps Metals</b>
Emission Factor in lb/mmBtu	2.5E-07	3.7E-07	2.1E-06	2.4E-08	
Potential Emission in tons/yr	2.34E-05	3.43E-05	1.89E-04	2.16E-06	5.35E-04

**HAPs - Organics**

Emission Factor in lb/mmcf	Methylnaphthalene 2.4E-05	3-Methylchloranthrene 1.8E-06	7,12-Dimethylbenz(a)anthracene 1.6E-06	Acenaphthene 1.8E-06	Acenaphthylene 1.8E-06
Emission Factor in lb/mmBtu	2.4E-08	1.8E-09	1.6E-09	1.8E-09	1.8E-09
Potential Emission in tons/yr	2.16E-06	1.62E-07	1.44E-07	1.62E-07	1.62E-07

fo1&2com.wk4 9/95

**HAPs - Organics(continued)**

Emission Factor in lb/mmcf	Anthracene 2.4E-06	Benz(a)anthracene 1.8E-06	Benzene 2.1E-03	Benzo(a)pyrene 1.2E-06	Benzo(b)fluoranthene 1.8E-06
Emission Factor in lb/mmBtu	2.4E-09	1.8E-09	2.1E-06	1.2E-09	1.8E-09
Potential Emission in tons/yr	2.16E-07	1.62E-07	1.89E-04	1.08E-07	1.62E-07

updated 4/99

**HAPs - Organics(continued)**

Emission Factor in lb/mmcf	Benzo(g,h,i)perylene 1.2E-06	Benzo(k)fluoranthene 1.8E-06	Chrysene 1.8E-06	Dibenzo(a,h)anthracene 1.2E-06	Dichlorobenzene 1.2E-03
Emission Factor in lb/mmBtu	1.2E-09	1.8E-09	1.8E-09	1.2E-09	1.2E-06
Potential Emission in tons/yr	1.08E-07	1.62E-07	1.62E-07	1.08E-07	1.08E-04

**HAPs - Organics(continued)**

Emission Factor in lb/mmcf	Fluoranthene 3.0E-06	Fluorene 2.8E-06	Formaldehyde 7.5E-06	Hexane 1.8E+00	Indeno(1,2,3-cd)pyrene 1.8E-06
Emission Factor in lb/mmBtu	2.9E-09	2.7E-09	7.4E-09	1.8E-03	1.8E-09
Potential Emission in tons/yr	2.71E-07	2.52E-07	6.76E-07	1.62E-01	1.62E-07

**HAPs - Organics(continued)**

Emission Factor in lb/mmcf	Naphthalene 6.1E-04	Phenanthrene 1.7E-05	<b>Total Haps Organics</b>	<b>Total Haps Combined</b>
Emission Factor in lb/mmBtu	6.0E-07	1.7E-08		
Potential Emission in tons/yr	5.50E-05	1.53E-06	1.63E-01	1.63E-01

**Methodology**

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton